

- (6) A list of pre-marked exhibits, including designations of interrogatories and answers thereto, requests for admissions and responses, which each party intends to offer at the trial with a specification of those which will be admitted in evidence without objection, those that will be objected to and the Federal Rule of Evidence in support of said objection and the Federal Rule of Evidence relied upon by the proponent of the exhibit.

**Schedule (6)(1)  
Plaintiff's Exhibits**

<b>Plaintiff's Exhibit No.</b>	<b>Description</b>	<b>Defendants' Basis for Objection</b>	<b>Plaintiff's Response to Objection</b>
PX 1	Complaint (B1-18)	Unsworn allegations; inadmissible hearsay	Several allegations in Complaint paragraphs 1, 8, 27, 29, 31-33, and 36 are admitted in Defendants' Answer (PX 2) to which Defendant has no objection. As such, they are admissions and thus are not hearsay. F.R.E. 801(d)(2).
PX 2	Defendants' Answer and Affirmative Defenses to Plaintiff's Complaint (B19-35)	No objection	
PX 3	Defendants' Responses and Objections to Plaintiff's First Set of Interrogatories Directed to Defendants Nos. 1, 2, and 18 (B36-49)	No objection	
PX4	Job Description, Responsibilities, and Duties for Plaintiff's Portfolio Administrator Position (P3-6)	Improper designation	Designation does not unfairly prejudice Defendants, and document headings speak for themselves.  Defendants cite to no authority for position that Plaintiff cannot designate her own exhibits.
PX5	EMPLOYEE PROFILE/HISTORY for Blozis, Linda J.[.] (10/23/1998) (MEL/BLOZ454)	No objection	

<b>Plaintiff's Exhibit No.</b>	<b>Description</b>	<b>Defendants' Basis for Objection</b>	<b>Plaintiff's Response to Objection</b>
PX 6	EMPLOYEE PROFILE/HISTORY for Blozis, Linda J.[.] (8/30/2004) (MEL/BLOZ455)	No objection	
PX 7	Award from M. McGuinn to L. Blozis of 2/12/00 "With Thanks and Appreciation for Your Years of Loyalty and Service" (P41)	Relevance; confusion; waste of time; lack of authentication	This document rebuts Defendants' allegations of a lack of commitment by Plaintiff and other performance reasons for her discharge. Plaintiff can authenticate this document.
PX 8	Letter of Reference from William S. Becker RE: Linda J. Blozis (4/8/02) (P27)	Relevance; confusion; waste of time; lack of authentication	This document rebuts Defendants' allegations that Plaintiff's managers, including the author of this letter of reference, had issues with Plaintiff's performance. Plaintiff and the author can authenticate this document.
PX 9	Letter of Reference from Gregg Landis RE: Linda J. Blozis (4/5/02) (P28)	Relevance; confusion; waste of time; lack of authentication	This document rebuts Defendants' allegations that Plaintiff's managers, including the author of this letter of reference, had issues with Plaintiff's performance. Plaintiff and the author can authenticate this document.
PX 10	Letter from D. Kloppenburg to L. Blozis of 2/20/02 RE: Mellon's Private Wealth Management 2001 Portfolio Team Incentive Plan (P360)	Relevance; confusion; waste of time; lack of authentication	This document evidences Plaintiff's good performance and rebuts Defendants' allegation that Plaintiff's performance was poor. Plaintiff can authenticate this document.

<b>Plaintiff's Exhibit No.</b>	<b>Description</b>	<b>Defendants' Basis for Objection</b>	<b>Plaintiff's Response to Objection</b>
PX 11	E-mail from C. Sutherland to L. Blozis of 4/1/02 RE: Linda Blozis (P40)	Relevance; confusion; waste of time; lack of authentication	Defendants' manager's admission less than 2 years before Plaintiff's discharge that Plaintiff showed a "commitment to making [Defendants'] office a success" is relevant to her performance. Plaintiff can authenticate this document.
PX 12	E-mail from D. Kloppenburg to L. Blozis of 6/24/02 (P39)	Relevance; confusion; waste of time; lack of authentication	Defendants' manager's admission less than 13 months before Plaintiff's discharge that Plaintiff showed a "commitment to making [Defendants'] office a success" is relevant to her performance. Plaintiff can authenticate this document.
PX 13	E-mail from K. Breze to L. Blozis of 6/26/02 (P38)	Relevance; confusion; waste of time; lack of authentication	Defendants' manager's admission less than 13 months before Plaintiff's discharge that Plaintiff provided "excellent customer service" is relevant to her performance. Plaintiff can authenticate this document.
PX 14	E-mail from P. Kochis to B. Gilmore of 10/9/02 (P35-36)	Relevance; confusion; waste of time; lack of authentication	Defendants' manager Bill Becker's admission less than 10 months before Plaintiff's discharge regarding the "high level of service [Plaintiff] provides to clients" is relevant to her performance. Plaintiff can authenticate this document.

<b>Plaintiff's Exhibit No.</b>	<b>Description</b>	<b>Defendants' Basis for Objection</b>	<b>Plaintiff's Response to Objection</b>
PX 15	E-mail from R. Olney to L. Blozis of 10/9/02 (P37)	Relevance; confusion; waste of time; lack of authentication	Defendants' manager's admission less than 10 months before Plaintiff's discharge thanking Plaintiff's for her "help" with a matter is relevant to her performance.  Plaintiff can authenticate this document.
PX 16	E-mail from R. Olney to L. Blozis of 10/18/02 (MEL/BLOZ453)	Relevance; confusion; waste of time; lack of authentication	Defendants' manager's admission less than 10 months before Plaintiff's discharge that Plaintiff "went above and beyond the call of duty" is relevant to her performance.  Plaintiff can authenticate this document.
PX 17	E-mail from P. Kochis to L. Blozis of 10/20/02 (P34)	Relevance; confusion; waste of time; lack of authentication	Defendants' manager's admission less than 10 months before Plaintiff's discharge thanking Plaintiff for "staying on top of [a matter]" is relevant to her performance.  Plaintiff can authenticate this document.
PX 18	E-mail from P. Kochis to M. Bannister, R. Olney, B. Gilmore, L. Blozis, G. Landis, W. Becker, and C. Sutherland of 10/20/02 RE: An Example of the Gold Standard (P33)	Relevance; confusion; waste of time; lack of authentication	Defendants' manager's admission less than 10 months before Plaintiff's discharge thanking Plaintiff for "doing what is right for the client" is relevant to her performance.  Plaintiff can authenticate this document.

<b>Plaintiff's Exhibit No.</b>	<b>Description</b>	<b>Defendants' Basis for Objection</b>	<b>Plaintiff's Response to Objection</b>
PX 19	E-mail from J. Dever to L. Blozis of 6/19/03 (P29-29a)	Relevance; confusion; waste of time; lack of authentication	Defendants' Assistant Vice President's admissions that Plaintiff was "a lifesaver" and was "helpful as always" less than one month before Plaintiff's discharge is relevant to her performance.  Plaintiff can authenticate this document.
PX 20	History of Events (2/11/03-6/26/03) (MEL/BLOZ695)	No objection	
PX 21	E-mail from L. Blozis to G. Landis of 3/13/03 RE: Vacation dates (Blozis Dep. Ex. 23, B922)	No objection	
PX 22	E-mail from L. Blozis to G. Landis of 3/18/03 RE: Brendan [Gilmore] (P31)	No objection	
PX 23	Excerpt from Defendants' Employee Handbook RE: Complaints/Appeal Process (MEL/BLOZ482-84)	No objection	
PX 24	Defendants' Corporate Policies & Procedures Manual Document Number CPP-504-6 RE: Employee Complaint/Appeal Process (9/27/02) (MEL/BLOZ500-503)	No objection	
PX 25	E-mail from P. Kochis to R. Thomas 5/9/03 RE: Linda Blozis (MEL/BLOZ689-690)	No objection	

<b>Plaintiff's Exhibit No.</b>	<b>Description</b>	<b>Defendants' Basis for Objection</b>	<b>Plaintiff's Response to Objection</b>
PX 26	Notes of Gregg Landis RE: LINDA BLOZIS FILE and Meeting with Rosemary Thomas of HR on 5/12/03 (MEL/BLOZ684)	No objection	
PX 27	E-mail from R. Thomas to G. Landis of 5/16/03 RE: Linda Blozis (MEL/BLOZ687)	No objection	
PX 28	Excerpt from Defendants' Employee Handbook RE: Managing Performance Through Corrective Action (MEL/BLOZ477-481)	No objection	
PX 29	Defendants' Corporate Policies & Procedures Manual Document Number CPP-504-5(A) RE: Corrective Action Process (8/4/04) (MEL/BLOZ516-18)	No objection	
PX 30	E-mail from R. Thomas to B. Gilmore of 7/2/03 RE: L. Blozis (MEL/BLOZ693)	No objection	
PX 31	E-mail from G. Landis to B. Gilmore of 7/10/03 RE: L. Blozis (MEL/BLOZ694)	No objection	
PX 32	Plaintiff's wage and benefit records: Tax Returns (P215-357, 864-910)	Object to the extent any part of documents are subject to defendants' motion in limine; object on the grounds of relevance, confusion, waste of time as to documents containing 2001, 2002 and 2003 tax returns and information.	Plaintiff incorporates by reference herein her Memorandums in Opposition to Defendants' Motions in Limine.  These documents are relevant and admissible to proving Plaintiff's economic losses as a result of her July 14, 2003 discharge.

<b>Plaintiff's Exhibit No.</b>	<b>Description</b>	<b>Defendants' Basis for Objection</b>	<b>Plaintiff's Response to Objection</b>
PX 33	Plaintiff's wage and benefit records: W-2's (P358-59, 860-63)	Object to the extent any part of documents are subject to defendants' motion in limine; object on the grounds of relevance, confusion, waste of time as to documents containing 2001 and 2002 tax returns and information.	Plaintiff incorporates by reference herein her Memorandums in Opposition to Defendants' Motions in Limine.  These documents are relevant and admissible to proving Plaintiff's economic losses as a result of her July 14, 2003 discharge.
PX 34	Plaintiff's wage and benefit records: Benefits (P366, 368-419)		
PX 35	Plaintiff's economic expert report of Thomas C. Borzilleri, Ph.D. on lost earnings, pension, and 401(k) benefits (1/29/07 -1/30/2007)	Subject to motion in limine; inadmissible hearsay;	Plaintiff incorporates by reference herein her Memorandums in Opposition to Defendants' Motions in Limine.  This document is a business record and thus admissible under F.R.E. 803(6).

<b>Plaintiff's Exhibit No.</b>	<b>Description</b>	<b>Defendants' Basis for Objection</b>	<b>Plaintiff's Response to Objection</b>
PX 36	Plaintiff's Medical expenses (P570-583, 585-811, 815)	Subject to motion in limine; relevance; confusion; waste of time; lack of authentication; some of documents cover times when Plaintiff was employed	<p>Plaintiff incorporates by reference herein her Memorandums in Opposition to Defendants' Motions in Limine.</p> <p>These documents are relevant and admissible to prove Plaintiff's compensatory damages under Title VII and 19 <u>Del. C.</u> Section 715(1)c.</p> <p>Plaintiff can authenticate these documents.</p>
PX 37	Plaintiff's damages arising from forced sale of home (P819-845)	Subject to motion in limine; inadmissible hearsay; relevance; lack of authentication	<p>Plaintiff incorporates by reference herein her Memorandums in Opposition to Defendants' Motions in Limine.</p> <p>This document is a business record and thus admissible under F.R.E. 803(6).</p> <p>These documents are relevant and admissible to prove Plaintiff's general damages under 19 <u>Del. C.</u> Section 715(1)c, Title VII, and the ADEA.</p> <p>Plaintiff can authenticate these documents.</p>

<b>Plaintiff's Exhibit No.</b>	<b>Description</b>	<b>Defendants' Basis for Objection</b>	<b>Plaintiff's Response to Objection</b>
PX 38	Table: Expectation of Life and Expected Deaths by Race, Sex, and Age (Offered for the Court's use only)	Confusion; waste of time; relevance; untimely production	<p>This document is relevant to prove Plaintiff's life expectancy for the Court's determination of future economic losses after a jury verdict for Plaintiff.</p> <p>In order to provide the most current life expectancy table, Plaintiff produced this document on May 22, 2007, 27 days before trial. Defendants are not unfairly prejudiced by its admission.</p>
PX 39	Records of Plaintiff's Post-Termination Job Search and Mitigation of Damages (P422-566)	Object to 565-566 (K. Agne's resume); relevance; lack of authorization	These documents are relevant and admissible to rebut Defendants' defense of failure to mitigate damages. Plaintiff is willing to withdraw these exhibits if Defendants waive its mitigation defense.
PX 40	U.S. EEOC Notice of Right To Sue (9/28/05) (Offered for Court's jurisdictional use only, not for the jury) (P111)	No objection	

Plaintiff reserves the right to use any Exhibit listed by Defendants.